

**REMARKS**

The Applicants request reconsideration of the rejection.

Claims 29, 31 and 36-43 are now pending.

Claims 29-35 were rejected under 35 U.S.C. §102(e) as being anticipated by Blumenau et al., U.S. Patent 6,421,711 (Blumenau). The Applicants traverse as follows.

As noted in the prior Remarks submitted June 14, 2004, Blumenau is directed to a data storage system having virtual ports for data transfer. Blumenau's system comprises a cached storage subsystem 20 having plural logical units or volumes, accessed by a plurality of hosts 22-25 coupled to plural port adapters 35-36. In port adapter 35, for example, a volume access table 80 defines a correspondence between hosts and volumes accessible to each host through the port adapter. By this table, each host can see only a subset of the volumes in the cached storage subsystem 20.

Blumenau discloses a conventional user verification scheme using a password at login time. In such a scheme, whether the user can log into the host is determined by the password. Blumenau does not disclose a private logical unit accessible from a computer being used by a

predetermined user whose user name indicates the user and is used to determine whether access to the private logical unit may be granted. Thus, a user A may access a private logical unit A from his or her own computer A, or from another computer B, so long as the user A logs in using the user name A. The computer A can no longer access the logical unit A in this case.

On the other hand, because Blumenau only discloses password-based login verification, whether the logical unit is accessible is determined based on the host ID, not the user name.

In addition, in the volume access table shown in Fig. 5, the host IDs (Host Group Name, Host controller WWN, and Host controller S\_ID) are related with the volume list pointer, which indicates a volume list shown in Fig. 6 (see column 13, line 27 - column 14, line 56). Therefore, correspondence between host ID and volume IDs, which indicate volumes accessible from the host indicated by the host ID, is stored in the volume access table. Fig. 9 to Fig. 10 (noted by the Examiner in the Office Action on Page 4, lines 19-21) also show the preferred form of construction for the volume access table 80 (see column 13, lines 29-31), and the correspondence between a host ID and

volume IDs are also shown in these figures (Fig. 9 to Fig. 10).

Because accesses from a host to a volume are permitted based on the volume access table (that is, only accesses from a host indicated by the host IDs registered in the volume access table (82) to a volume registered in a volume list shown in Fig. 6 corresponding to the host IDs are accepted in the port adapter (35)), each of the plurality of logical units (or volumes) in the cached storage subsystem is a private logical unit of a predetermined (determined based on the volume access table) host.

Thus, the concept of the claimed invention is different from and not taught by Blumenau, because each of the logical units of the claimed invention is a private logical unit of a predetermined user, but each of the logical units of Blumenau is a private logical unit of a predetermined host.

The difference is significant. In the claimed system, a user can use any one of the plurality of computers by inputting a permitted user name into the computer, and the user can access his own private logical unit from any one of the plurality of computers. On the other hand, in Blumenau, a host that can see or access a logical unit is predetermined by the volume access table. Therefore, if a

user wants to access the logical unit, the user must log in the predetermined host.

Independent Claim 29 thus patentably defines over Blumenau in reciting that the management computer is arranged to manage mutual correspondence between a user name and logical unit identification information indicating a private logical unit of a user indicated by the user name. When the management computer receives a user name inputted to a computer and computer identification information indicating the computer, the management computer finds at least one private logical unit of a user indicated by the received user name, and informs the storage system of logical unit identification information indicating the found at least one private logical unit and the received computer identification information. Therefore, the storage system can permit the computer indicated by the received computer identification information to access the at least one private logical unit indicated by the received logical unit identification information.

By the system explained above, a computer permitted to access a private logical unit is determined in the storage system based on information transmitted from the management computer, and the management computers transmit the

information based on both of the mutual correspondence between a user name and logical unit identification information and a combination of the received user name and the received computer identification information.

Therefore, when a combination of a user and a computer, which is used by the user, is changed, a combination of the user name and the computer identification information, both of which are received at the management computer is changed, and a combination of a private logical unit and a computer, which is accessible to the private logical unit, is changed. Like this, the user can access his own private logical unit from any one of the plurality of computers, so that the above-explained concept can be realized.

The Office Action asserted that Blumenau discloses a user login process, in which a user password is inputted (citing column 36, line 61 to column 37, line 3), and a volume access and mapping table (citing Figs. 5, 8-9, and 23-24; column 33, line 40 to column 34, line 10; and column 35, line 20 to column 36, line 24) stored in the cached storage subsystem. The login process of Blumenau, however, does not require a mutual correspondence between a user name and a logical unit indicating at least one private logical unit of the user indicated by the user name, or management of the same by a management computer. Moreover,

Blumenau does not disclose that the management computer finds at least one private logical unit of a user indicated by the received user name, or informs the storage system of logical unit identification information indicating the found at least one private logical unit and the received computer identification information, so that the storage system can permit the computer used by the user to access the user's private logical unit.

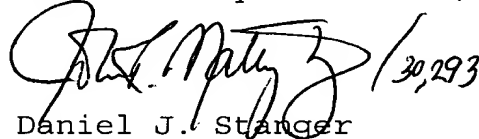
New independent Claim 39 recites that a combination of a computer and a private logical unit, which the computer can detect, is changed according to a combination of a computer and a user name, which is inputted into the computer. This feature has been distinguished above.

The dependent claims patentably define over Blumenau and the other art of record, at least by virtue of the patentable features of the respective independent claims distinguished above. The Applicants note, however, that the Office Action does not contain the necessary prima facie showing of unpatentability; one cannot prove a rejection of dependent claims "by virtue of their dependency on independent claims" as asserted on Page 8 of the Office Action, it being noted that no "other reasons" were "set forth below."

In closing, the Applicants note the Examiner's comment on Page 6 of the Office Action, that "the law of anticipation requires that a distinction be made between the invention described or taught and the invention claimed, [but] does not require that the reference 'teach' what the subject patent teaches (sic)." Respectfully, there is more than one hundred years of case law that disagrees with this position. Axiomatically, if the prior art does not "teach" what the subject application (or patent) claims (as opposed to what the subject application or patent teaches), there can be no anticipation because the invention has not been demonstrated to belong to the prior art.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of the rejections and allowance of the claims.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Daniel J. Stanger", followed by the date "3/30/2005" written in a smaller, slanted script.

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